

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:
All Actions

**MOTION FOR PROTECTIVE
ORDER CONCERNING
PLAINTIFFS' SUBPOENA TO
W.J. MINKOWYCZ, Ph.D.**

Pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16.3, Defendants 3M Company and Arizant Healthcare Inc. (collectively "Defendants") respectfully move the Court for a protective order requiring Plaintiffs to withdraw their belated and improper subpoena to W.J. Minkowycz, Ph.D. To the extent Dr. Minkowycz has been forced to spend time preparing to respond to Plaintiffs' subpoena, Plaintiffs should be ordered to compensate him for his time.

Defendants rely in support of this motion on the accompanying memorandum of law and the Declaration of Monica L. Davies, together with all prior proceedings and pleadings heretofore had herein.

Dated: February 26, 2018

Respectfully submitted,

s/ Monica L. Davies

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